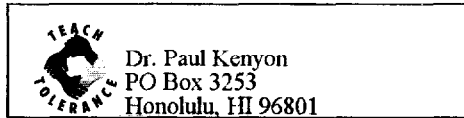


21 April 2000



Dockets Management Branch (HFS-305)
Food and Drug Administration
5630 Fisher Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 97N-0436
Feasibility of Appropriate Methods of Informing Customers of
Contents of Bottled Water: FDA Draft Study Report

To Whom it May Concern:

Thank you for allowing the public to submit comments to the Food and Drug Administration. I would like to offer a few suggestions to incorporate into your draft study report, regarding safety and labeling standards for BOTTLED WATER.

First, since most bottled water available is "cleaned up" in some manner, I suggest disclosing the method of water purification to the consumer. For example, distillation, carbon filtration, reverse osmosis, ultra-violet light, ozone infusion, etc. Each one of these methods yields a standard of purity which addresses specific types of contamination ranging from heavy metals, pesticides and carcinogens, to microbes and radioactives. The type of purification speaks for itself, so I suggest disclosing the method to the consumer.

At the turn of the century, the problem with water born illness was considerable. For the most part, chlorine treatment of municipal water sources was adequate. (A modern method, yielding less adverse side-effects would be to infuse ozone (O3) into bottled drinking water and then pass the water through an ultra-violet light device. This method would control microbial contamination and eliminate the need for chlorination which has always presented the consumer with a risk/benefit scenario. However, as your staff well knows, modern health problems associated with drinking water are predominantly heavy metals, man-made organic toxins and possibly radioactives. Thus, the focus of my remaining comments will be about protecting the consumer, especially children and "old folks" from exposure to heavy metal contamination and man-made organic toxins.

As the natural water sources on the planet become increasingly polluted with heavy metals and man-made organic toxins, the "cleaning opportunity" for both the natural environment and the cellular environment of the human body is progressively compromised. In the final analysis, cleansing of the earth, along with billions of biological organisms, is accomplished by water. Pure water is nature's universal solvent. The very properties of pure water are biologically astounding and the spiritual aspect is amazing as well. Without water, life as we know it is not possible.

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The internal cellular environment can not be any cleaner than the purity of the water ingested by the individual. There is little question about the need for pure water. Yet, very few consumers actually know what contaminants are in their water supply. Infirmary, age or physical/mental handicap may restrict access to safe drinking water. Pure bottled water may become their primary option as the purity of tap water becomes unsuitable for human consumption. That is the case in many countries around the world. In fact, in Honolulu, many health-conscious residents do not drink the tap water because certain pineapple and sugar industrial chemicals have gotten into the water tables and down-graded the quality. (Despite the chemicals, the water is still good.)

Each of approximately one hundred wells on the island of Oahu has a unique thumbprint of man-made organic toxins. The chemical manufactures promised the Hawaii State Legislature that their chemicals would never be found in the water tables. The plain and simple truth is that the chemical company representatives who testified twenty-five years ago, lied to the Legislature. Today, many health-conscious individuals are aware of the above information. They purchase bottled-water which has been processed and purified and is allegedly free of toxins, microbes, pesticides, heavy metals and other waste that could cause harm.

HEAVY METALS, FLUORINATED PESTICIDES AND FLUORIDE...

Of special interest to the consumer is the need to be assured that bottled water is free from heavy metals, especially lead, arsenic, aluminum, cadmium. These metals are known to be neuro-toxic and to cause damage to the brain and central nervous system. Of equal importance is the need to test for and prohibit **fluorinated pesticides** from contaminating bottled water. Alarming numbers of such pesticides are already in the environment effecting the quality of drinking water throughout the nation. As we speak, there are a considerable number of fluorinated pesticides at the FDA awaiting patent approval.

Another problem in the same halogen group is bromine pesticides. These compounds also pose a threat to health and should also be monitored, prohibited, strictly controlled to prevent contamination of bottled drinking water.

I have reviewed a considerable amount of objective information related to the subject of fluoride. **For reasons of public health and safety, I believe Fluoride should also be strictly prohibited from bottled water. This statement is based on the following information.**

Page 3 Bottled Water/Dr. Kenyon

The industrial waste-grade forms of fluoride used for municipal water programs are known to be contaminated with varying amounts of lead and other heavy metals. (Source: American Water Works Association, ANSI/AWWA B702-94, 6666 West Quincy Ave., Denver, Colorado 80235). Incidentally, Dr. Thomas G. Reeves, who is now with CDC, previously served as Chairman of AWWA Standards Committee on Fluorides.) Because of the known neuro-toxic effects of lead on the brain and central nervous system of children, the toleration level is zero.

The fluoride ion is a highly reactive agent, readily bonding with positive charged metals; many of which are neurotoxic. Because of the exceedingly small ionic radius of the fluoride ion, it is capable of penetrating the Blood Brain Barrier and transporting heavy metals, including lead, cadmium and aluminum, etc. deep into the brain structure.

Fluoride is also capable of potentiating the effects of these neuro-toxic metals once they are transported into the brain. For the record, the fluorinated pesticides which I mentioned earlier, are anticholinergic, that is, they have properties that interfere with acetylcholine nerve transmission. **This effect is not strictly confined to the intended pesticide target (rodents or other vermin).** Pesticide residue (as high as 7.0 ppm) can be easily ingested while eating fruits and vegetables. This concentration level combined with other common commercial sources of fluoride raises the intake to potentially harmful levels. Leading Edge researchers have uncovered German legal records dating back to the 1850's which provide evidence of serious physical harm caused by fluoride fumes and the court-record documentation to prove it.

In London, England, Dr. John Harvey Clark, M.D., published "A Dictionary of Practical Materia Medica" in the year 1900. On page 782, he describes how Calcium Fluoride reacts with a mild solution of Sulfuric Acid to form HYDROFLUORIC ACID. (This reaction might also be occurring under natural conditions when environmental fluorides mix with "acid rain".) **In the Clinical portion of Dr. Clark's presentation, he states that Hydrofluoric Acid is associated with BRAIN ATROPHY (p.782).** Recent research by Dr. Phyllis Mullinex, a toxicologist, also raises questions about the effect of fluoride on the brain and CNS. When her most recent proposal was submitted to the National Institutes of Health, NIH flatly rejected the research grant designed to prove her theory. (This action could be construed as a continuation of the same "tight lip" fluoride-policy that has been in place for the past half century with regard to disclosing essential public health information.) Either way, this policy must be pried open and scrutinized. The people must be protected and without proper science to formulate public policy, the public can not be protected. In my opinion, the current state of affairs is alarming, to say the least.

FOR GOOD HEALTH, KEEP THE FLUORIDE OUT...

Purified bottled water that is free of fluoride and related heavy metals (by FDA directive) will provide consumers with water quality essential for flushing organic man-made toxins out of the body. The solvent capability of water will not be compromised and many heavy metals (known to be neuro-toxic) will not be transported into the brain by "fluoride carriers." Pure water, free from neuro-toxic contaminants is essential for maintaining good health and a strong bio-economy.

CHRONIC OVER-EXPOSURE, A PROBLEM NOW FACING VIRTUALLY EVERYONE IN THE COUNTRY...

The recommended dosage of fluoride for dental health is 1.0 ppm. Trying to control and manage the intake of fluoride ingested by children at the recommended safe dental level (1 ppm), is no longer realistic or possible. The plain and simple truth is that fluoride is now in a state of ubiquitous saturation throughout the entire nation (and probably many regions of the world as well.) Despite wide-spread dental decay, modern problems associated with fluoride intake are related to "over-dosage" resulting from excessive amounts of fluoride in the environment causing chronic, low-level exposure and adverse health effects. With that said, consider the following statement taken from a peer-reviewed journal.

"The optimal level of fluoride intake has never been determined scientifically and has been used only in general terms. Levy and Guha-Chowdhury addressed the limitation of current knowledge of optimal fluoride intake." (JADA, vol. 126, December 1995, page 1625)

CHRONIC, OVER-EXPOSURE TO FLUORIDE AND FLUORINATED COMPOUNDS IS SIMPLY NOT GOOD FOR YOUR HEALTH...

From a practical standpoint, the average American is already suffering from chronic overexposure to fluoride derived from the air, water, food, toothpaste, mouthwash, canned drinks, dental treatments, fluorinated psychiatric agents such as Prozac, and a multitude of other pharmaceutical medications that utilize fluoride as an "ionic carrier". Yet, within professional circles, there is still much controversy about fluoride and fluoridation programs.

Pure bottled water mandates may be one way for "Uncle Sam" to begin bracing for fluoride law suits. On the optimistic side, mandating pure, bottled water standards, is a step in the right direction to re-confirming the FDA's commitment to protecting the public.

THE TRUTH, THE WHOLE TRUTH, NOTHING BUT THE TRUTH...

Virtually no one really knows the true history about fluoride. The reason is quite simple. Fluoride played a prominent role in the development of the atomic bomb in the 1940's. The project was directed by the Pentagon. However, declassified government documents are beginning to shed light on the reasons for the fluoride controversy for the past fifty years. **The bottom line is that decision makers (including officials at the FDA) have not been properly briefed about the truthful nature of fluoride because the subject is classified and has been shrouded in secrecy since the early 1940's.** This also explains why the FDA has never tested fluoride for safety and effectiveness as required by federal law since the passage of the Food, Drug and Cosmetic Act of 1938. (This was verified and re-verified between 1993-1999, in a series of letters between the Honorable John V. Kelly of the New Jersey General Assembly and Frank R. Fazzari and Betty A. McRoy of the FDA's Prescription Drug Compliance and Surveillance Division).

PSEUDO-RECOGNITION WILL NOT SUFFICE FOR OFFICIAL APPROVAL...

Endorsement and recognition of fluoride by one hundred national organizations is little more than "Color of Law" by surrogate agencies (just following directions). None of which have the authority to officially endorse an **untested chemical such as fluoride**. Only the FDA has been granted the authority by Congress to conduct the tests and make such pronouncements. The health of the entire nation is being jeopardized by this policy. The fact of the matter is that officials don't have the proper information required to stipulate proper health measures. There are two logical reasons for this assertion. Strict military mandates of silence combined with fifty years of secrecy surrounding the Manhattan Project has compromised the nation's health and caused the issue of fluoride to become grid-locked in a state of "political limbo". This situation must be rectified.

PUBLIC HEALTH DECISIONS PROMULGATED ON THE BASIS OF FALSE INFORMATION IS NOT A PRUDENT GOVERNMENT POLICY...

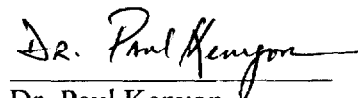
Furious debates about fluoridation programs have been based, unknowingly, on misinformation or frank disinformation. Apparently, no one in the public sector fits the military designation of "having a need to know". Therefore, virtually no one has had access to internal fluoride studies conducted by the military which could provide essential threat-assessment information required for implementing proper "civilian" and national fluoride health measures. However, because of numerous studies revealing hazardous effects from fluoride exposure, I believe, there is a greater need for "National Health Security" than there is for National Security. National Health Agencies and government health officials must be properly appraised of the truthful facts and circumstances of fluoride with regard to neuro-toxicity to the brain and CNS.

The extent to which the government has tried to keep a lid on the adverse effects of fluoride is disconcerting. This is clearly exemplified by the research of two investigative journalists, Joel Griffith and Chris Bryson, who discovered that the full extent of such adverse health effects was actually **censored** by the Atomic Energy Commission (AEC). The reason given and could be expected was "National Security". This response has its place, but not any longer with regard to the threat of ubiquitous fluoride. Quite possibly, the health of the Nation has been compromised for the past fifty years as a result of this "secrecy policy". **Virtually no one IN A DECISION MAKING CAPACITY took the time or was able to get to the bottom of this issue.** I suspect that most government officials just accepted the controversial nature of fluoride as a fact of life. However, in reality, the need to conceal the truth served a dual purpose; protecting both the military project and Uncle Sam. The classified information remained secret and the government was protected from possible law suits forthcoming from the families of injured parties due to injuries caused by exposure to fluoride while working on the Manhattan Project. This has gone on for too long. **THE COLD WAR IS OVER.**

The FDA needs to conduct the proper tests on fluoride for safety and effectiveness (if that is actually possible). Let's get the facts straight and take the proper action to protect the public. Which brings this lengthy discourse back to the topic of bottled water. The reason most people drink purified bottled water is because they are concerned about their health. Fluoride is the last thing anyone would want in their drinking water with the above facts in mind. Unless a disclaimer (similar to the poison labels now on toothpaste) was added to all bottled water stating: "For reasons of National Security, FDA has not subjected Fluoride to proper testing for safety and effectiveness as required by Federal law since 1938..."

Thank you for allowing me to offer comments on this important subject of bottled water. If I can be of any further assistance, by way of documentation or reference material, do not hesitate to contact this office.

Yours, in matters of good health,



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PH. 808-946-0686

cc. Ms. Rebecca Buckner, FDA
Senator Suzanne Chun-Oakland
(From the Hawaii State Legislature)



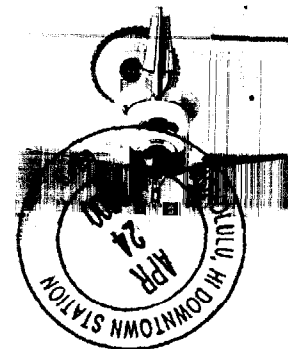
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